

Message

**From:** Casso, Ruben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E33DF0ABBBF049959E9100E556C7E634-CASSO, RUBEN]  
**Sent:** 2/16/2021 7:36:17 PM  
**To:** Witt, Jon [Witt.Jon@epa.gov]  
**CC:** Verhalen, Frances [verhalen.frances@epa.gov]  
**Subject:** FW: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review  
**Attachments:** Complete appl-A-0733-Santa Teresa.pdf; FinalPermit(0733M15R1).pdf; A-0733-Santa Teresa Facility Form UA1.doc; A-0733-Santa Teresa Facility -Form UA2\_.xls; A-0733-Santa Teresa Facility-UA3.doc; Modeling Reoport Sterigenics Santa Teresa.doc

Jon – My power just came back on – for now. Got this from New Mexico. Forwarding it while I can. -Ruben

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**From:** Mustafa, Sufi A., NMENV <sufi.mustafa@state.nm.us>  
**Sent:** Friday, February 12, 2021 11:48 AM  
**To:** Casso, Ruben <Casso.Ruben@epa.gov>; Higgin, Roslyn, NMENV <Roslyn.Higgin@state.nm.us>  
**Subject:** RE: DRAFT NESHAP Commercial Sterilizers regulation development QA/QC review

Ruben

I am sorry for a delayed response.

We checked to see what has been done in modeling and emission inventory. We did not find any modeling analyses for the toxics listed in the spreadsheet. Since this is not a title v facility or a facility that emit >100 tpy of a criteria pollutant we had not collected emission inventory from them.

I am attaching some documents we found in our database related to their permit. I also attached my modeling analyses review report from 2006.

I will search for the stack test data report you requested. I will let you know soon.

Note:

Because Propylene Oxide is a HAP but is not a NM TAP (is not listed in Table A of NMAC 20.2.72.501) there are no modeling files that include it. Below is quick comparison of the allowable emissions from the current permit, and those in the EPA spreadsheet –

Stack	Description	Permitted "EO or PO" 0733M15R1 (Issued 12/23/2014) (TPY)	Allowable Propylene Oxide Emissions from EPA spreadsheet (TPY)
AR	Aeration rooms		47.9
SRA	Sterilizer room area, Fugitive Emissions		3.38
SC	Sterilization chambers, Chamber Exhaust		8.46
SC	Sterilization chambers, Sterilization		773

SW	Shipping or warehouse, Fugitive Emissions		5.08
CD-1 or CD-2	Ceilcote Acid-Water Scrubber System, controls sterilizer vacuum pumps for chambers	5.7	
CD-3	Donaldson 20,000 AG EtO Abator, controls aeration rooms 8-9 and back vent exhausts	0.4	
Total		6.1	837.5

Please let me know if you need any other information.  
Thank you.

Sufi A. Mustafa, Ph.D.

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